

IN THE DISTRICT COURT OF THE UNITED STATES  
FOR THE DISTRICT OF SOUTH CAROLINA  
ANDERSON DIVISION

UNITED STATES OF AMERICA	)	CR NO.: 8:23cr309
	)	18 U.S.C. § 922(g)(1)
	)	18 U.S.C. § 924(a)(2)
	)	18 U.S.C. § 924(a)(8)
	)	18 U.S.C. § 924(e)
	)	18 U.S.C. § 924(d)(1)
vs.	)	21 U.S.C. § 841(a)(1)
	)	21 U.S.C. § 841(b)(1)(C)
	)	18 U.S.C. § 924(c)(1)(A)
	)	21 U.S.C. § 853
	)	21 U.S.C. § 881
SHAMERIAN CORLANDIS JONES	)	28 U.S.C. § 2461(c)

**INFORMATION**

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES:

That on or about March 22, 2022, in the District of South Carolina, the Defendant, SHAMERIAN CORLANDIS JONES, knowingly possessed a firearm which had been shipped and transported in interstate and foreign commerce, to wit: a Glock 9mm pistol and 9mm ammunition, having previously been convicted of a crime punishable by imprisonment for a term exceeding one year, and knowing that he had been convicted of such a crime;

In violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(2), and 924(e).

COUNT 2

THE UNITED STATES ATTORNEY FURTHER CHARGES:

That on or about March 22, 2022, in the District of South Carolina, the Defendant, SHAMERIAN CORLANDIS JONES, knowingly, intentionally, and unlawfully did possess with intent to distribute a quantity of marijuana, a Schedule I controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D).

COUNT 3

THE UNITED STATES ATTORNEY FURTHER CHARGES:

That on or about March 22, 2022, in the District of South Carolina, the Defendant, SHAMERIAN CORLANDIS JONES, knowingly did possess a firearm in furtherance of a drug trafficking crime as set forth in Count 2 of this Indictment, which is prosecutable in a court of the United States;

In violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT 4

THE UNITED STATES ATTORNEY FURTHER CHARGES:

That on or about September 9, 2022, in the District of South Carolina, the Defendant, SHAMERIAN CORLANDIS JONES, knowingly possessed firearms, all of which had been shipped and transported in interstate and foreign commerce, to wit: a Smith & Wesson 9mm pistol, a Taurus .40 caliber pistol, 9mm ammunition and .40 caliber ammunition, having previously been convicted of a crime punishable by imprisonment for a term exceeding one year, and knowing that he had been convicted of such a crime;

In violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(8), and 924(e).

**FORFEITURE****DRUGS/ FIREARM OFFENSES:**

Upon conviction for felony violations of Titles 18 and 21, United States Code, as charged in this Information, the Defendant, SHAMERIAN CORLANDIS JONES, shall forfeit to the United States all of the Defendant's rights, title, and interest in and to any property, real and personal,

- (a) constituting, or derived from any proceeds the Defendant obtained, directly or indirectly, as the result of such violation(s) of Title 21, United States Code, and all property traceable to such property;
- (b) used or intended to be used, in any manner or part, to commit or to facilitate the commission of such violations of Title 21, United States Code;
- (c) any firearms and ammunition (as defined in 18 U.S.C. § 921) –
  - (1) used or intended to be used to facilitate the transportation, sale, receipt, possession or concealment of controlled substances or any proceeds traceable to such property;
  - (2) involved in or used in any knowing violations of 18 U.S.C. §§ 922 or 924, or violation of any other criminal law of the United States, or intended to be used in a crime of violence.

**PROPERTY:**

Pursuant to Title 18, United States Code, Section 924(d)(1), Title 21, United States Code, Sections 853 and 881, and Title 28, United States Code, Section 2461(c), the property which is subject to forfeiture upon conviction of the Defendant for the offenses charged in this Information includes, but is not limited to, the following:

(a) Firearms:

- (1) Smith & Wesson M&P 9 Shield EZ, 9mm pistol with a magazine  
Serial Number: NJP0579
- (2) Taurus 740 Slim, .40 caliber pistol with a magazine  
Serial Number: SIU68769
- (3) Glock model 19, 9mm pistol with an extended magazine  
Serial Number: BUAZ840

(b) Ammunition:

Miscellaneous rounds of 9mm and .40 caliber ammunition

(c) Proceeds/Forfeiture Judgment:

A sum of money equal to all proceeds the Defendant obtained, directly or indirectly, as a result of the drug offense charged in this Information, and all interest and proceeds traceable thereto as a result of his violation of 21 U.S.C. § 841.

SUBSTITUTION OF ASSETS:

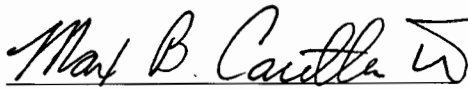
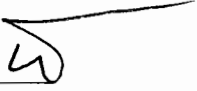
If any of the property described above as being subject to forfeiture, as a result of any act or omission of the Defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third person;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) to seek forfeiture of any other property of Defendant up to an amount equivalent to the value of the above-described forfeitable property.

Pursuant to Title 18, United States Code, Section 924(d)(1), Title 21, United States Code, Sections 853 and 881, and Title 28, United States Code, Section 2461(c).

ADAIR F. BOROUGHS  
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